

UNITED STATES DISTRICT COURT  
NORTHERN DISTRICT OF NEW YORK

----- X  
SHAKUR WINGATE,

Plaintiff,

- against -

DR. IMTIAZ SAMAD; DR. SUBBARAO  
RAMINENI; MICHELLE CHERI; and  
JOHN/JANE DOES 1-5,

Defendants.  
----- X

**NOTICE OF MOTION**

9:25-cv-00207  
(BKS/TWD)

Motion By:

LETITIA JAMES

Attorney General of the State of New York  
Attorney for Defendant Defendants IMTIAZ  
SAMAD, M.D.; SUBBARAO RAMINENI,  
M.D.; and MICHELLE CHERI, R.N.

By: JONATHAN P. PILAT, ESQ.  
Assistant Attorney General, of Counsel  
Bar Roll No. 706085

Time and Place of Hearing:

\_\_\_\_\_, at \_\_\_\_\_ a.m./p.m. before  
Chief District Court Judge Brenda K. Sannes  
to be held at the United States District  
Courthouse in Syracuse, New York, **upon**  
**submission only.**

Relief and Basis:

An Order pursuant to F.R.C.P. 12(b)(6)  
dismissing plaintiff's Complaint in its  
entirety, with prejudice, and for such other and  
further relief as the Court deems just and  
proper.

Supporting Papers:

Attorney Declaration of Jonathan P. Pilat,  
Esq.; and Defendants' Memorandum of Law.

Dated: Syracuse, New York  
June 13, 2025

LETITIA JAMES  
Attorney General of the State of New York  
Attorney for Defendants  
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By: 

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To: Hon. Therese Wiley Dancks  
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Northern District of New York  
U.S. District Court  
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